

March 18, 2008

Mr. Christopher A. Whyrick
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Whyrick:

The Rudy Giuliani Presidential Committee, Inc. (hereinafter "Committee"), FEC ID# C00430512, is in receipt of your Request for Additional Information (RAI) dated February 22, 2008, referencing the Year End Quarterly FEC Report (10/1/07 - 12/31/07). The Committee's response follows.

Schedule A-P

As previously indicated, in accordance with 11 CFR 110, and as a part of its regular contributions screening process, the Committee reviews each contribution received for possible regulatory related issues. All contributions received by the Committee that exceed the contribution limits are reattributed, redesignated or refunded pursuant to the procedures and time frame limits set forth in 11 CFR 110.1(k)(3)(ii)B, 11 CFR 110.1(b)(3)(i), and 11 CFR 110.1(b)(3)(i). In addition, the Committee takes the additional step of noting, via memo text language associated with each such transaction entry, that the Committee is taking all reasonable actions to remedy any potential contribution limit issue.

With regard to Mary's PAC and Keystone PAC, the Committee has refunded the excessive portions of the contributions and will reflect these transactions on the March 2008 Monthly report.

We have reviewed the listing of contributors on the RAI addendum titled "Excessive and/or Prohibited Contributions." Any necessary changes have been reflected on the February 2008 Monthly report filed on February 20, 2008. For all other relevant donors on the list, as noted in the memo text for each relevant transaction on the Year End report, a reattribution, redesignation, or a refund has been processed and those transactions were either reported on the February 2008 Monthly report or will be reported properly on the Committee's March 2008 Monthly report.

The Committee has determined Robert Birch's record was correctly reported on the Year End 2007 report but, due to a clerical error, was incorrectly reported in the April 2007 Quarterly Report. The Committee will file an amended April 2007 Quarterly Report.

Finally, as a part of the Committee's routine procedures as noted above, the Committee has determined that many of the paired contributors on the list are, in fact, unique donors. Those donors and their aggregate contribution amounts have been reported accurately and, therefore, do not require any further action.

Sincerely,

John H. Gross
Treasurer
